



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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**BUSINESS APPOINTMENT APPLICATION: George Freeman MP, former Minister of State for Science, Research and Innovation. Paid appointment with GHGSat(UK) Ltd.**

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Ministers (the Rules) seeking advice on taking up a paid role as an Adviser for GHGSat(UK)Ltd (GHGSat).
2. The purpose of the Rules is to protect the integrity of the government. The Committee has considered the risks associated with the actions and decisions made during your time in office, alongside the information and influence you may offer GHGSat, as a former minister. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's advice is not an endorsement of the appointment - it imposes a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules.
4. The Ministerial Code sets out that ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers of the Crown, and Members of Parliament, are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

The Committee's consideration of the risks presented

5. The Department for Science, Innovation and Technology (DSIT) has an indirect relationship with GHGSat -with some of the department's arm's length bodies working with the company. Although GHGSat wrote to you as a minister in 2022, this was dealt with at official level rather than through ministerial

correspondence. Whilst in office, you neither met with the company, nor did you make any policy, regulatory or commercial decisions that would have affected GHGSat specifically. Therefore, the Committee<sup>1</sup> considered that the risk that this role could be seen as a reward for your decisions in office is low.

6. As the Minister of State for Science, Research and Innovation at DSIT, you had access to privileged information on scientific, technological and civil space policies. There is some general overlap in this policy area. For example, you were the minister responsible for the UK Space Agency, which is operated at arm's length from DSIT. DSIT was not aware of any specific information you have had access to that would offer an unfair advantage, and there is no direct overlap with your involvement in policy, i.e., your work on the decision to reassociate with the satellite programme Copernicus. Further, it has been over five months since you last had access to information as a minister.
7. There are risks associated with your influence and network of contacts gained whilst in ministerial office. In particular, this is a company that is interested in government policy and decisions relating to the civil space sector and emissions. You noted you have made it clear to the company that you will not lobby government on its behalf, and this will not form part of your role. There is also a risk if your role in developing its business outside of government were to draw specifically on contacts in the private sector and foreign governments only gained as a result of your role as a minister.
8. The Committee's consideration also recognised that you have a background in a similar area outside of your time in government and will likely have a network from this experience that you can draw upon.

#### The Committee's advice

9. The Committee considered the risks associated with your access to information to be limited for the reasons above. The main risks are that you could be seen to make improper use of contacts that you may have made whilst in government service to gain business for your new employer; and that you might offer GHGSat unfair access, as the company has a potential interest in the direction of government policies relating to the civil space and emissions sectors.
10. The conditions below prevent you from lobbying government and making use of privileged information, contacts and your influence to the company's unfair advantage.

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<sup>1</sup> This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Hedley Finn OBE; Sarah de Gay; The Rt Hon Baroness Jones of Whitchurch; Dawid Konotey-Ahulu; The Rt Hon Lord Eric Pickles; Michael Prescott; and Mike Weir.

11. In accordance with the government's Business Appointment Rules, the Committee advises that this appointment with **GHGSat(UK) Ltd** be subject to the following conditions:

- you should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available to you from your time in ministerial office;
- for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of GHGSat(UK) Ltd (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or ministerial office to influence policy, secure business/funding or otherwise unfairly advantage GHGSat(UK) Ltd (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office, you should not provide advice to on behalf of GHGSat(UK) Ltd (including parent companies, subsidiaries, partners and clients) on the terms of, or with regard to the subject matter of, a bid with, or contract relating directly to the work of the UK government or any of its arm's length bodies;
- for two years from your last day in ministerial office, you should not become personally involved in lobbying contacts you developed during your time in office in other governments and organisations for the purpose of securing business for GHGSat(UK) Ltd.

12. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; there are separate rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the Registrar of Lords' Interests<sup>2</sup>. You are reminded that as a Member of Parliament you have a separate ban on paid lobbying under the Parliamentary Code of Conduct. It is an applicant's personal responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.

13. By 'privileged information' we mean official information to which a minister or Crown servant has had access as a consequence of his or her office or employment and which has not been made publicly available. Applicants are

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<sup>2</sup> All Peers and Members of Parliament are prevented from paid lobbying under the the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on your obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers

also reminded that they may be subject to other duties of confidentiality, whether under the Official Secrets Act, the Civil Service Code or otherwise.

14. The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant/Minister *“should not engage in communication with government (Ministers, civil servants, including special advisers, and other relevant officials/public office holders) – wherever it takes place - with a view to influencing a government decision, policy or contract award/grant in relation to their own interests or the interests of the organisation by which they are employed, or to whom they are contracted or with which they hold office.”*
15. You must inform us as soon as you take up employment with this organisation(s), or if it is announced that you will do so. Please also inform us if you propose to extend or otherwise change the nature of your role as, depending on the circumstances, it may be necessary for you to make a fresh application.
16. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website, and where appropriate, refer to it in the relevant annual report.

The Rt Hon Lord Pickles

## **Annex - Material Information**

1. According to its website, GHGSat is a global emissions monitoring company. It uses its own satellites and aircraft sensors to measure greenhouse gas emissions directly from industrial sites, providing actionable insights to businesses (oil and gas, waste management, mining, agriculture), governments, and financial services. With remote-sensing and patented technology, GHGSat enables strategic decision-making through monitoring and analytics services.
2. You wish to take up a part-time, paid role with GHGSat as an Adviser. You said that your role will be to advise GHGSat on business development strategies in science and technological innovations. You will assist the company in its understanding and navigation of global geopolitical challenges and opportunities in the UK's emissions tracking sector. You have made it clear to GHGSat that your role must not include any activity that would be considered lobbying.
3. You said you considered this as returning to a former career where you worked for 15 years prior to becoming an MP and then a minister. You said your previous work focussed on science and technology consulting, corporate

finance advisory, and investing. You worked for the Cambridge Cluster<sup>3</sup> from 1996 to 2010, founding and financing high growth technology companies and promoted industries in biology and life sciences.

#### Dealings in office

4. You said that you did not meet with GHGSat whilst in office. You said that you did not make any policy or regulatory decisions specific to GHGSat whilst in office. You said as minister responsible for the UK Space Agency, you made the decision for the UK to reassociate with Copernicus<sup>4</sup>, the EU's Earth observation programme, following Brexit. This decision is likely to have been seen positively by the sector GHGSat operates in, as it operates in the civil space sector.

#### Departmental assessment

5. DSIT confirmed that you did not meet with GHGSat whilst in office. It said that GHGSat UK wrote to you in 2022, but this was dealt with through official channels and not through ministerial correspondence.
6. DSIT said that you did not make any policy, regulatory or commercial decisions specific to GHGSat whilst in office. It considered the risks regarding your access to information are limited - it was not aware of any information you have that would offer it an unfair advantage.
7. DSIT noted that GHGSat has a relationship with the department at arm's length:
  - GHGSat provides methane monitoring data to The Satellite Applications Catapult. The Satellite Applications Catapult works in collaboration with the UK Space Agency (an executive agency sponsored by DSIT) to deliver on the UK Space Ecosystem.
  - GHGSat works with the National Physical Laboratory (an ALB funded by DSIT) to standardise methane monitoring data
8. DSIT recommended standard conditions.

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<sup>3</sup> <https://www.cambridgenetwork.co.uk/the-network/cambridge-cluster>

<sup>4</sup> <https://climate.copernicus.eu/>